

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

VOTE.ORG, *et al.*,

Plaintiffs,

v.

GEORGIA STATE ELECTION
BOARD, *et.al.*,

Defendants,

GEORGIA REPUBLICAN PARTY,
INC.; and REPUBLICAN NATIONAL
COMMITTEE,

Intervenor-Defendants.

No. 1:22-cv-01734-JPB

**INTERVENOR-DEFENDANT REPUBLICAN NATIONAL
COMMITTEE’S NOTICE OF JOINDER IN THE STATE
DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Intervenor-Defendants Georgia Republican Party, Inc. and Republican National Committee (“Intervenor-Defendants”) join the State Defendants’ motion for summary judgment and adopts and fully incorporates their arguments supporting dismissal of Plaintiffs’ claims on the merits except for State Defendants’ arguments relating to redressability (Section I.A.1) and sovereign immunity (Section I.A.2). *See* Doc. 156-1.

Because the Plaintiffs have failed to show any injury from the pen and ink rule or otherwise, the Plaintiffs lack standing to bring their claims. *Muransky v. Godiva Chocolatier, Inc.*, 979 F.3d 917, 924 (11th Cir. 2020). Further the Plaintiffs have no implied right of action under the Voting Rights

Act. *Ziglar v. Abbasi*, 582 U.S. 120, 131–32 (2017); *Egbert v. Boule*, 596 U.S. 482, 491–92 (2022). And finally, the Plaintiffs have failed to establish that the pen and ink rule violates the Materiality Provision of the VRA. 52 U.S.C. § 10101(a)(2)(B).

For the reasons set forth by the State Defendants in their Motion for Summary Judgment and Brief in Support thereof, fully adopted and incorporated by the Intervenor-Defendants as if fully stated herein, except for Sections I.A.1 and I.A.2., the Intervenor-Defendants request summary judgment be granted in their favor.

Dated: March 7, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE AND CERTIFICATE
OF COMPLIANCE WITH LOCAL RULE 5.1**

Pursuant to N.D. Ga. L.R. 5.1(C), I prepared the foregoing in Century Schoolbook font and 13-point type. I electronically filed it using CM/ECF, thus electronically serving all counsel of record.

Dated: March 7, 2024

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